

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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HERMA ROBINSON,	:	
	:	No. 10-CIV-3926 (JFB) (AKT)
Plaintiff,	:	
	:	
v.	:	SUPPLEMENTAL
	:	DECLARATION OF
ZURICH AMERICAN INSURANCE COMPANY, and	:	PETER A. WALKER, ESQ.
JENNIFER ROBBIE aider and abettor,	:	
	:	
Defendants.	:	
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I, **PETER A. WALKER, ESQ.**, being duly sworn, declare under penalty of perjury that the foregoing is true and correct:

1. I am a member of the law firm of Seyfarth Shaw LLP, attorneys for Defendants Zurich American Insurance Company (“Zurich”) and Jennifer Robbie (“Robbie”) (collectively, “Defendants”), in the above-captioned action. This Declaration is submitted in further support of Defendants’ Fed. R. Civ. P. 56 motion for summary judgment dismissing the Complaint of plaintiff Herma Robinson (“Robinson”) in its entirety.
2. Attached as “Exhibit A” are true and correct copies of the relevant pages from the Transcript of the Deposition of Herma Robinson, taken on May 16, 2011.
3. Attached as “Exhibit B” are true and correct copies of the relevant pages from the Transcript of the Deposition of Jennifer Robbie, taken on May 18, 2011.
4. Attached as “Exhibit C” are true and correct copies of the relevant pages from the transcript of the Deposition of Patricia Magid, taken on June 1, 2011.
5. Attached as “Exhibit D” are true and correct copies of the relevant pages from the transcript of the Deposition of Joseph Kostkowski, taken on July 28, 2011.

6. Attached as “Exhibit E” are true and correct copies of excerpts from Jennifer Robbie’s Objections and Answers to Plaintiff’s First Set of Interrogatories.

7. Attached as “Exhibit F” are true and correct copies of excerpts from Zurich’s Best Practices, produced during discovery and identified by Bates Nos. ZURICH0012887; ZURICH0012867; ZURICH001270; ZURICH0012891; ZURICH0012895; and ZURICH0012900.

8. Attached as “Exhibit G” is a true and correct copy of an email between Jennifer Robbie and Herma Robinson, dated October 16, 2007, produced by Plaintiff during discovery and identified by Bates Nos. Robinson 417.

9. Attached as “Exhibit H” is a true and correct copy of an email between Jennifer Robbie and Joe Kostkowski dated October 19, 2007, produced during discovery and identified by Bates Nos. ZURICH003177 through ZURICH003179.

s/Peter A. Walker
Peter A. Walker, Esq.

Executed: December 9, 2011